

**MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT TECHNICAL REVIEW DOCUMENT**

**Permitting and Compliance Division
1520 E. Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901**

**PPL Montana, LLC
Colstrip 1, 2, 3 and 4
P.O. Box 38
Colstrip, MT 59323**

The following table summarizes the air quality programs testing, monitoring, and reporting requirements applicable to this facility.

Facility Compliance Requirements	Yes	No	Comments
Source Tests Required	X		Method 5, Method 9
Ambient Monitoring Required		X	
COMS Required	X		OP0513-02, Appendix E
CEMS Required	X		NO _x and SO ₂
Schedule of Compliance Required	X		Compliance Plan Section III.A
Annual Compliance Certification and Semiannual Reporting Required	X		As Applicable
Monthly Reporting Required		X	
Quarterly Reporting Required	X		
Applicable Air Quality Programs			
ARM Subchapter 7 Preconstruction Permitting	X		Permit #0513-04
New Source Performance Standards (NSPS)	X		40 CFR 60, Subpart D
National Emission Standards for Hazardous Air Pollutants (NESHAPS)	X		No, Except for 40 CFR 61, Subpart M
Maximum Achievable Control Technology (MACT)		X	
Major New Source Review (NSR)		X	
Prevention of Significant Deterioration (PSD)	X		
Risk Management Plan Required (RMP)	X		
Acid Rain Title IV	X		OP0513-02, Appendix H
Compliance Assurance Monitoring (CAM)	X		OP0513-02, Appendix I
State Implementation Plan (SIP)	X		General SIP applies

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SECTION I. GENERAL INFORMATION

A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emission units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the United States Environmental Protection Agency (EPA) and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in the Title V Operating Permit renewal application submitted to the Department of Environmental Quality (Department) by PPL Montana, LLC, (PPL) on June 27, 2002. Additional information for the renewal application was received on October 10, 2003. Conclusions in this document are also based on information gathered from the original permit issued April 1973 and August 1981, and the PSD permit issued by the EPA in 1979. Further, information was gathered from the application submitted by the Montana Power Company (MPC) – Colstrip (Colstrip) on June 12, 1996, and additional information submitted December 20, 1995, February 9, 1996, September 18, 1996, October 7, 1996, December 16, 1996, and September 16, 1997. Additional submittals were provided on May 14, 1998; August 13, 1998, August 16, 1999; June 26, 2000; and May 1, 2001.

B. Facility Location

Colstrip operates the Colstrip Steam Electric Station consisting of 4 tangential coal fired boilers and associated equipment for generation of electricity. The Colstrip facility is located in Section 2, Township 2 North, Range 41 East, Rosebud County, Montana.

C. Facility Background Information

On April 23, 1973, Permit **#513-111472 (#0513-00)** was issued to the MPC for the construction of Colstrip Units 1 & 2, and on August 26, 1981, Montana Air Quality Permit #0513-00 was issued to Colstrip for the operation of Colstrip Units 1 & 2.

A petition for modification of the permit was filed by MPC on January 25, 1978. On February 28, 1978, the Board of Health and Environmental Sciences issued a board order to modify the Preconstruction Permit. The modification included changing the height of the two stacks to 525 feet and allowing the inlet SO₂ monitor values to be based on a three-hour average.

Permit **#0513-01** was issued to Colstrip to include the installation and operation of a Syncoal Truck Dump and a lime silo bin vent. Syncoal fines and coarse product are combined to form a blend product that will be supplied to Units 1&2. The installation and operation of these sources will increase the allowable particulate emissions for Units 1&2 by 1.12 ton/yr. Permit #0513-01 replaced Permit #0513-00 (513-111472).

Permit **#1187** was issued to MPC on January 20, 1977, for the construction of Colstrip Units #3 and #4. Because the proposed facility was a major source under the Prevention of Significant Deterioration (PSD) program, the additional review requirements of the PSD program applied to the project. The state did not have authorization to implement the PSD program at the time of the application; therefore, the PSD review was conducted by the EPA. EPA issued a PSD permit for the construction of the facility on September 11, 1979.

State Permit **#1187-M1** was issued on February 5, 1980, and Permit **#1187-M2** was issued on May 26, 1981. The modifications were completed because of changes to the applicable rules and standards of the Administrative Rules of Montana (ARM) and to include changes that had been made at the facility differing from the original application.

On October 13, 1996, Permit **#1187-03** was issued. The permit correctly identified the actual maximum heat input capacity of Colstrip Units #3 and #4. The units are each rated at a heat-input capacity of 7573 MMBtu/hour with a production capacity of 778 Megawatts. These are nominal capacities for the facility and, depending on plant operating conditions, actual heat input to the facility may be as high as 8000 MMBtu/hour.

Permit #1187-M2 and the EPA permit contained emission limits for particulate, SO₂, and NO_x with units of lb/MMBtu. To ensure that emissions from the facility were not higher than those on that the original analysis was based, this permit established emission limits for these pollutants in the units of lb/hour. The new emission limits were established based on the nominal heat input to the boilers of 7573 MMBtu/hour multiplied by the current emission limits in lb/MMBtu. Permit #1187-03 also placed a yearly fuel consumption limit on each unit. The limit was equal to the heat input of each unit operating at the nominal heat input rate of 7573 MMBtu/hr for 8760 hours per year. This limit ensured that emissions of pollutants, that didn't have limits in the permit, were not increased above current levels. The permit also incorporated requirements from the PSD permit issued by EPA in 1979. These requirements were incorporated at the request of MPC for the purpose of developing a comprehensive document that contained pertinent requirements from both the state permit and the EPA PSD permit. Permit #1187-03 replaced Permit #1187-M2.

On September 30, 1998, Permit **#1187-04** was issued to MPC for the Colstrip 3&4 facility. The alteration included incorporation of a 3-hour rolling average SO₂ limit, the 1% inlet sulfur standard that was inadvertently removed during the previous modification, and the removal of the inlet monitor requirement.

The 3-hour SO₂ limit was incorporated in the permit to ensure protection of the 3-hour SO₂ standard. During the last permit action, the maximum heat inputs for 3&4 were discovered to be 8,000 MMBtu/hr. Because these heat inputs were higher than those in the original permit, the Department and MPC agreed that short-term SO₂ and NO_x emission limits would be implemented. The Department completed modeling for the short-term SO₂ emission limits. MPC was limited to a maximum of 4273 lb/hr of SO₂, averaged over any rolling 3-hour period from both stacks combined. These limits allowed MPC the flexibility of operating unit 3 or unit 4 at a higher level at any one time, while continuing to ensure protection of the standard.

The 1% inlet sulfur limit existed in the original permit, but was inadvertently removed during a previous permit action. MPC continued to maintain compliance with the 1% inlet sulfur limit, even though it was not stated in the permit.

The requirement for the inlet sulfur monitor as a compliance demonstration for the inlet sulfur content was replaced with an on-going fuel-sampling analysis. The on-going fuel-sampling analysis yielded a more accurate account of the sulfur content of the fuel, as compared to the sulfur content being correlated to SO₂ emissions.

The permitting action was an alteration of Permit #1187-03 because of the change in the compliance demonstration for the 1% sulfur content limit. The 1% sulfur content limit and demonstration of compliance was included in the February 28, 1978, Board of Health and Environmental Sciences Findings of Fact and Conclusions of Law and Order. The alteration process allowed public involvement in the change in the compliance demonstration method. However, the permitting action did not result in any change in the emissions from the facility. Permit #1187-04 replaced Permit #1187-03.

In letters dated June 18, 1999, and August 16, 1999, MPC and PPL requested that the permits for Colstrip 1&2 and Colstrip 3&4 be transferred to reflect the new ownership. The transfer of the permits was to occur when the transfer of ownership to PPL Montana, LLC was final. Through the Department's review, it was determined that Colstrip Units 1&2 and 3&4 would now be defined as one source. Therefore, the permit modification transferred ownership, as well as combined Permits #0513-01 and #1187-04. The permit conditions remained the same, but were simply combined into one permit. Permit **#0513-02** replaced Permits #0513-01 and #1187-04.

On September 10, 2000, Permit **#0513-03** was issued to Colstrip to conduct a test burn of petroleum coke/Syncoal/Rosebud coal fuel combination in Units 1&2. A petroleum coke consumption limit was placed in the permit to ensure that the proposed test burn did not exceed 15 tons per year of any pollutant. Because the emissions from this project were less than 15 tons per year of any pollutant, the project occurred in accordance with the ARM 17.8.745(1). Permit #0513-03 replaced Permit #0513-02.

On May 1, 2001, Colstrip submitted a completed application to the Department proposing to add petroleum coke to the list of fuels to be used in Units 1&2, that are currently permitted to burn Syncoal and Rosebud coal. The alteration to Permit #0513-03 limited the amount of petroleum coke that could be burned in Units 1&2. The conditions included in the permit for the burning of petroleum coke are Section II.A.9, 10, 11, 12, and 13, Section II.B.3 and Section II.F. The permitting action was not considered a major modification under the PSD regulations because the facility was capable of accommodating petroleum coke. Permit **#0513-04** replaced Permit #0513-03.

D. Current Permit Action

The current permit action is a renewal of Title V Operating Permit #OP0513-01 and Operating Permit #OP1187-00. The two permits, along with the Acid Rain Permit #AR1187-00 will be combined as Permit **#OP0513-02**. Changes in the permit include the addition of two small propane fueled emergency backup generators at the facility, and the removal of the auxiliary boiler for Colstrip 3&4. Also, Colstrip submitted a CAM Plan for PM for Units 1-4 in accordance with 40 CFR Part 64. A summary of the CAM plan can be found in Appendix I of the Title V Operating Permit. A complete copy of the CAM plan can be obtained from the Department or the facility.

The Department included a compliance plan/schedule in Section III.A.15. The Department believes that Colstrip has not been able to demonstrate compliance with protection of the 3-hour and 24-hour SO₂ increments (ARM 17.8.804 and ARM 17.8.820) on the Northern Cheyenne Reservation. The condition requires Colstrip to submit a narrative description of how the facility will demonstrate compliance with these increments and provide a schedule for achieving such compliance

The permit was also updated to reflect current permit rule citations and format. Permit #OP0513-02 will replace Permits #OP0513-01, #OP1187-00, and #AR1187-00.

E. Taking and Damaging Analysis

HB 311, the Montana Private Property Assessment Act, requires analysis of every proposed state agency administrative rule, policy, permit condition or permit denial, pertaining to an environmental matter, to determine whether the state action constitutes a taking or damaging of private real property that requires compensation under the Montana or U.S. Constitution. As part of issuing an Operating Permit, the Department is required to complete a Taking and Damaging Checklist. A checklist was completed on December 30, 2003 for Colstrip 1, 2, 3, and 4.

F. Compliance Designation

The Colstrip facility is inspected at least annually by the Department. Colstrip Units 1-4 were last inspected by the Department on September 10, 2003. The facility was found in compliance with all permit requirements and limitations.

Upon issuance of Draft Permit #OP0513-02, the Department did not believe that Colstrip had been able to demonstrate compliance with protection of the 3-hour and 24-hour SO₂ increments (ARM 17.8.820) on the Northern Cheyenne Reservation. Therefore, the Department required PPL to submit a narrative description of how PPL would demonstrate compliance with these increments and provide a schedule for achieving such compliance. The compliance demonstration was to be based on air quality modeling as approved by the Department.

The draft permit requested that PPL submit a final compliance plan for approval within 180 days after final issuance of the facility's Title V Operating Permit #OP0513-02. The final compliance plan was required to contain the following information:

- a. A schedule of remedial measures to assure compliance;
- b. Milestones associated with those measures in appropriate sequence;
- c. A schedule of submission of certified progress reports (no less frequently than every 6 months); and
- d. Any anticipated change in applicable requirements.

The draft permit stated that PPL was required to achieve and demonstrate compliance with protection of the 3-hour and 24-hour SO₂ increments on the Northern Cheyenne Reservation within 18 months after the final issuance of Permit #OP0513-02.

PPL submitted a modeling demonstration to the Department on September 22, 2004, concerning the impact of emissions from Colstrip Units 3 and 4 on the 3-hour and 24-hour SO₂ increments on the Northern Cheyenne Reservation. The Department and PPL, with participation by the Northern Cheyenne Tribe and EPA Region VIII, discussed this modeling and any appropriate refinements. The Department concurred that if an agreement on the modeling analysis could be reached and appropriate revisions to PPL's emission limits identified prior to this Title V permit being issued Proposed, the compliance schedule may not be necessary.

The modeling raised concerns that emissions from Colstrip Units 3 & 4 at the allowable 3-hour limit could cause a violation of the increment on the Northern Cheyenne Reservation. Based on the modeling, PPL submitted a request for an administrative amendment to the facility's Montana Air Quality Permit #0513-04 to reduce the 3-hour rolling average SO₂ emissions limit (combined stack limit) for Units 3 & 4 from 4,273 pounds/hour to 4,140 pounds/hour. At this limit, PPL is in compliance with ARM 17.8.820.

The Department requested one further sensitivity analysis be conducted to comply with the national modeling guidance and the model's demonstrated sensitivity to plume rise because the limit requested by PPL left no room for error. The Department and the Northern Cheyenne Tribe proposed that PPL consider 90% of the facility's increment consumption to leave room for error and avoid similar concerns of increment consumption in the future. PPL agreed to research the effects of decreasing the 3-hour limit on the facility's operation within the next several months. However, the modeling submitted by PPL, along with the request to amend Permit #0513-04, met the requirement proposed in Draft Permit #OP0513-02 and therefore condition III.A.17 was removed from Proposed Permit #OP0513-02. The Department will proceed with changing the 3-hour SO₂ limit in PPL's Montana Air Quality Permit. This limit will ultimately be contained in PPL's Title V permit.

SECTION II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

PPL Montana, LLC, operates the Colstrip Units 1, 2, 3, and 4 tangential coal fired boilers and associated equipment for the generation of electricity.

B. Emissions Unit and Pollution Control Device Identification

Emissions Unit ID	Description	Pollution Control Device/Practice
EU001	Unit #1 – Tangential Coal Fired Boiler	Wet Venturi Scrubber
EU002	Unit #2 – Tangential Coal Fired Boiler	Wet Venturi Scrubber
EU003	Unit #3 – Tangential Coal Fired Boiler	Wet Venturi Scrubber
EU004	Unit #4 – Tangential Coal Fired Boiler	Wet Venturi Scrubber
EU005	Auxiliary Propane Boiler	None
EU006	Building Heating Boiler	Fabric filters/enclosures
EU007	Coal Handling System (1&2)	Enclosed conveyors Dust Suppressant Telescopic Chute
EU008	Coal Handling System – (silos, distribution bin, surge pile tunnel, crushing and sampling house, and vacuum cleaning system) (3&4)	Fabric filters
EU009	Coal Piles (Wind Erosion)	Sealant on some storage piles, Dust suppression system, Enclosures
EU010	Internal Combustion Engines	None
EU011	Process Ponds	Material is wet
EU012	Scrubber Relining Process	None
EU013	Underground Gasoline Tanks	None
EU014	Emergency Diesel Generators	None
EU015	Lime Handling System	Pneumatic Unloading
EU016	Plant Roads	Dust suppressant is applied annually and water is applied as needed

C. Categorically Insignificant Sources/Activities

The following tables list the emissions units included as insignificant in Colstrip's operating permit.

Emissions Unit ID	Description
IEU01	Hydrazine Bulk Storage Tank Vent
IEU02	LPG Vaporizer
IEU03	Unit #1 Cooling Tower
IEU04	Unit #2 Cooling tower
IEU05	Unit #3 Cooling Tower
IEU06	Unit #4 Cooling Tower
IEU07	Waste Site
IEU08	Boiler Chemical Cleaning Process
IEU09	LPG System Safety Valves and Vents
IEU10	Process Tank Vents
IEU11	Process Ponds
IEU12	Boiler Chemical Cleaning Process
IEU13	Diesel Tanks

Cooling Towers #3 and #4 were included in the original operating permit application as insignificant emissions units. The Department questioned this determination and requested information from Colstrip.

The facility submitted additional information on December 16, 1996, in response to a request for information on the operating permit application for Colstrip Units 1&2, which included a statement that Colstrip 1&2 does not use any chromium-based compounds in the cooling towers. This also holds true

for Colstrip Units 3&4. Since the cooling towers are not major sources or integral part of a major source as defined in Section 112(a)(1) of the Federal Clean Air Act and chromium-based water treatments are not used, the Department agrees with Colstrip that the cooling towers are not subject to 40 CFR 63 Subpart Q. Therefore, IEU04, IEU05, IEU06, and IEU07 are considered insignificant emissions units.

The Building Heating Boiler emissions unit was identified in the original application as insignificant, but has been determined to be a significant emissions unit. It has been determined to be significant because if Colstrip operates the Building Heating Boiler under the alternative operating scenario there are specific applicable requirements. When Colstrip is not operating the Building Heating Boiler, there are no emissions and the emissions unit is in compliance with all applicable requirements. Colstrip is required to perform the necessary monitoring, recordkeeping, and reporting for all applicable requirements.

Two small propane fueled emergency backup generators were added to the insignificant unit list in Permit #OP0513-02.

SECTION III. PERMIT TERMS

A. Emission Limits and Standards

Tangential Coal Fired Boilers 1&2 (EU01 and EU02)

Colstrip Units 1 & 2 (EU01 and EU02) are subject to 40 CFR 60, Subpart D – Standards of Performance for Fossil-Fuel-Fired Steam Generators for which Construction Commenced After August 17, 1971. Under this provision, EU01 and EU02 have a SO₂ limit of 1.2 lb/MMBtu heat input and a NO_x limit of 0.7 lb/MMBtu heat input. Based on the maximum heat input value of the units, Colstrip is limited to a maximum fuel use of 28% petroleum coke and a maximum of 280,320 tons of petroleum coke during any rolling 12-month period for each emitting unit. The units are also limited to a maximum of 700,800 tons of Syncoal during any rolling 12-month period.

The Department determined Subpart D requirements for the monitors to be less stringent than the requirements of the Acid Rain Provisions contained in 40 CFR 75. The basis of this position is that the monitors required by 40 CFR 60, Subpart D are used to indicate compliance. The monitoring requirements of this Operating Permit are to be used to determine compliance. The following sections of 40 CFR 60 are not included in the Operating Permit as applicable requirements: 40 CFR §60.45(c) and 40 CFR §60.13(a) through (g) and (i) through (j). These requirements are replaced with the requirements contained in 40 CFR 75 and Colstrip is required to demonstrate compliance using the Part 75 CEMS for SO₂, NO_x, and opacity.

Colstrip Units 1 & 2 are subject to 40 CFR 60, Subpart Y – Standards of Performance for Coal Preparation Plants. The facility shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements in Subpart Y. Subpart Y affected sources include the truck dump station, the lime silo bin vent, and any other affected source constructed or modified after October 24, 1974.

The Phase II permit requirements for SO₂ have been included in this Operating Permit.

Colstrip submitted a Phase I Permit Application, NO_x Compliance Plan to EPA Region VIII in August 1996. The application was submitted in accordance with the requirements of 40 CFR §76.9 for an early election unit with a deadline of submittal of January 1, 1997. Colstrip Units #1 and #2 are Group 1, Phase II boilers. Colstrip will be required to comply with the emission limit of 0.45 lb/mmBtu of heat input on an annual average basis for tangentially fired boilers (40 CFR §76.5) beginning with January 1, 1997, emissions and ending with December 31, 2007.

In accordance with 40 CFR §76.8(d)(1)(ii), EPA is responsible for issuing the early NO_x reduction permit. The state has not been delegated this authority. Under 40 CFR §72.73(b)(2), the Department is required to include, not later than, January 1, 1999, the acid rain permit requirements for nitrogen oxides. Colstrip under the current requirements of 40 CFR §76.9(b) submitted a Phase II NO_x permit application by January 1, 1998.

Although not included in the Operating Permit, Colstrip must still comply with the requirements contained in the Phase I early election permit issued by EPA Region VIII until its expiration date. Compliance with the Phase I permit will be handled by EPA.

If Colstrip fails to demonstrate compliance with the applicable emissions limitations any year during the period beginning January 1, 1997, and ending December 31, 2007, the NO_x Compliance Plan will be terminated. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance. If the early election

plan is terminated, Colstrip will be required to comply with the applicable emissions limit for NO_x for Phase II units established pursuant to Section 407(b)(2) of the FCAA beginning on January 1, 2000, or on the effective date of termination if that date is after the year 2000.

Tangential Coal Fired Boilers 3 & 4 (EU03 and EU04)

In the original permit application, Colstrip identified the exhaust gas temperature, (190°F) and the limit of 1.225 lb/MMBTU on SO₂ emissions as applicable requirements for EU03 and EU04. The minimum exhaust gas temperature and this SO₂ limit were not identified in any air quality permits issued by the Department or by the Environmental Protection Agency (EPA) for EU03 or EU04. These requirements come from the certificate issued as part of the Major Facility Siting Act (MFSA). The Department does not consider these requirements as applicable requirements for operating permit purposes. The MFSA certificate required the Department to issue a Montana Air Quality Permit (MAQP). Based on this, the Department's position is that all the applicable requirements for operating permit purposes are contained in the MAQP.

Colstrip's EU03 and EU04 are subject to 40 CFR §60.40 (Subpart D) since construction of the units began after 1971 and before September 18, 1978.

The Department determined Subpart D requirements for the monitors to be less stringent than the requirements of the Acid Rain Provisions contained in 40 CFR 75. The basis of this position is that the monitors required by 40 CFR 60, Subpart D are used to indicate compliance. The monitoring requirements of this Operating Permit are to be used to determine compliance. The following sections of 40 CFR 60 are not included in the Operating Permit as applicable requirements: 40 CFR §60.45(c) and 40 CFR §60.13(a) through (g) and (i) through (j). These requirements are replaced with the requirements contained in 40 CFR 75 and PPL is required to demonstrate compliance using the Part 75 CEMS for SO₂, NO_x, and opacity.

The Department has determined the monitoring requirements contained in Appendix III of the EPA PSD permit issued September 11, 1979, and Sections II.C.1.e., II.C.2., II.E.1., and II.E.2. in MAQP #1187-03 issued October 13, 1996, are duplicate requirements. The Department has determined compliance with 40 CFR Part 75 will be compliance with these requirements for the SO₂, NO_x, and opacity monitors.

The Phase II permit requirements for SO₂ have been included in this Operating Permit.

Colstrip submitted a Phase I Permit Application, NO_x Compliance Plan to EPA Region VIII in August 1996. The application was submitted in accordance with the requirements of 40 CFR §76.9 for an early election unit with a deadline of submittal of January 1, 1997. Colstrip Units #3 and #4 are Group 1, Phase II boilers. Colstrip will be required to comply with the emission limit of 0.45 lb/mmBtu of heat input on an annual average basis for tangentially fired boilers (40 CFR §76.5) beginning with January 1, 1997, emissions and ending with December 31, 2007.

In accordance with 40 CFR §76.8(d)(1)(ii), EPA is responsible for issuing the early NO_x reduction permit. The state has not been delegated this authority. Under 40 CFR §72.73(b)(2), the Department is required to include, not later than, January 1, 1999, the acid rain permit requirements for nitrogen oxides. Colstrip under the current requirements of 40 CFR §76.9(b) submitted a Phase II NO_x permit application by January 1, 1998.

Although not included in the operating permit, Colstrip must still comply with the requirements contained in the Phase I early election permit issued by EPA Region VIII until its expiration date. Compliance with the Phase I Permit will be handled by EPA. If Colstrip fails to demonstrate compliance with the applicable emissions limitations any year

during the period beginning January 1, 1997, and ending December 31, 2007, the NO_x Compliance Plan will be terminated. The termination will take effect beginning January 1 of the year following the year for which there is a failure to demonstrate compliance. If the early election plan is terminated, Colstrip will be required to comply with the applicable emissions limit for NO_x for Phase II units established pursuant to section 407(b)(2) of the FCAA beginning on January 1, 2000, or on the effective date of termination if that date is after the year 2000.

Auxiliary Propane Boiler (EU05)

Colstrip is required to notify the Department of both start up and shut down of the auxiliary propane heater.

Building Heater Boiler (EU06)

Colstrip is required to notify the Department of both start up and shut down of the building heater boiler.

No other emission units at the facility contain source specific emissions limits or conditions.

B. Monitoring Requirements

ARM 17.8.1212(1) requires that all monitoring and analysis procedures or test methods required under applicable requirements are contained in Operating Permits. In addition, when the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

The requirements for testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance do not require the permit to impose the same level of rigor for all emission units. Furthermore, they do not require extensive testing or monitoring to assure compliance with the applicable requirements for emission units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. When compliance with the underlying applicable requirement for an insignificant emissions unit is not threatened by lack of regular monitoring and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo (**i.e., no monitoring**) will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring for insignificant emissions unit.

This permit includes periodic monitoring or recordkeeping for each applicable requirement. The information obtained from the monitoring and recordkeeping will be used by Colstrip to periodically certify compliance with the emission limits and standards. However, the Department may request additional testing to determine compliance with the emission limits and standards.

Colstrip Units 3&4 are required to maintain continuous emission monitoring systems (CEMS) for SO₂, NO_x, CO, and opacity. In addition, the Department determined continuous monitoring is also required for stack gas temperature, stack gas moisture (where necessary), megawatt production, and Btu per hour (as a function of heat rate and megawatt production).

The Department determined that fugitive emission units located at the facility require weekly visual inspections. The method of demonstrating compliance includes a requirement to observe specific sites and to log the information. The log will be kept at the plant site and be available for review during inspections. The compliance demonstration requires verification that visual inspections were performed and they were recorded and a log maintained.

The Department determined this frequency of visual monitoring was sufficient for this facility based on a

number of factors. First, the fugitive emissions of many of the locations are controlled using dust abatement techniques. Second, Colstrip has a Dust Abatement Program in place. The program is used to control fugitive dust emissions at the plant site and for the entire Colstrip area. The Dust Abatement Task Force (DATF) was formed in 1982 and meets at least once per year to set the strategies for the upcoming year's activities as well as to review the pertinent events from the previous year. As a result of the DATF, specific monitoring and control activities have evolved for the Colstrip area. The DATF has worked to ensure that monitoring and control of dust is integrated into the daily activities, which have the potential of creating emissions. The DATF also uses data from the ambient monitors required for Colstrip Units 3&4. The ambient monitoring requirements are contained in Operating Permit #OP0513-02.

Based on this information, the Department has determined the visual monitoring contained in the operating permit will provide a backup to the existing efforts of the DATF and ensure visual monitoring will continue on an ongoing basis.

C. Test Methods and Procedures

All source test recordkeeping shall be performed in accordance with the Montana Source Test Protocol and Procedures Manual.

D. Recordkeeping Requirements

Colstrip is required to keep all records listed in the Operating Permit as a permanent business record for at least five years following the date of the generation of the record. All source test recordkeeping shall be performed in accordance with the Montana Source Test Protocol and Procedures Manual. If Method 9 tests are conducted, the test reports must be maintained on-site and must be submitted to the Department upon request.

E. Reporting Requirements

Reporting requirements are included in the permit for each emissions unit, and Section V of the Operating Permit "General Conditions" explains the reporting requirements. However, Colstrip is required to semi-annual and annual monitoring reports to the Department, and to annually certify compliance with the applicable requirements contained in the permit. The reports must include a list of all emission limit and monitoring deviations, the reason for any deviation, and the corrective action taken as a result of any deviation. Colstrip is also required to submit quarterly reports as required by Section III.B, III.C, and Appendix H of Permit #OP0513-02.

F. Public Notice

In accordance with ARM 17.8.1232, a public notice was published in the *Billings Gazette* newspaper on October 20, 2004. The Department is providing a 30-day public comment period on the draft Operating Permit from October 20, 2004, to November 19, 2004. ARM 17.8.1232 requires the Department to keep a record of both comments and issues raised during the public participation process. The comments and issues received by November 19, 2004, will be summarized, along with the Department's responses, in the following table. All comments received during the public comment period will be promptly forwarded to Colstrip so they may have an opportunity to respond to these comments as well.

G. Draft Permit Comments: Permit #OP0513-02

Summary of Public Comments

The Department received no public comments on Draft Permit #OP0513-02.

Summary of Permittee Comments

Permit Reference	Permittee Comment	Department Response
Section I	Incorrect address	The Department made this correction
Section III.B.4.c.	Change CO _x to CO ₂	The Department made this correction
Section III.B.4.e, 2 nd line	Delete the requirement for Btu per hour calculated as a function of heat rate and megawatt production. Currently, plant Btu per hour heat input is calculated as per 40 CFR 60, Part 75 and submitted to the agencies. Heat input calculated as a function of heat rate and megawatt production in addition to what is already submitted, is a redundant requirement.	The Department removed this requirement. The calculation is an Acid Rain requirement and therefore already submitted.
Section III.C.15, 3 rd paragraph, 2 nd line	Delete “the” before “Colstrip”	The Department made this correction.
Section III.C.15, last paragraph	Correct the reference and/or clarify this requirement. This paragraph references Appendix G, the NO _x monitoring appendix. However, the paragraph is discussing visibility monitoring per EPA PSD permit and 40 CFR 52.21.	The Department removed this paragraph (which should have referenced the Ambient Monitoring Appendix) because the facility is no longer required to conduct ambient monitoring. The Department approved the removal of the ambient air quality monitoring requirements from permit #0513-04 in a letter dated October 19, 2001.
Section III.C.18.c	Change CO _x to CO ₂	The Department made this correction
Section III.C.28	Delete. This reporting requirement is overly burdensome and unnecessary. Colstrip does not approach the NO _x emission limits during startup conditions, which is the only time the plant burns alternate fuel. We encourage DEQ to perform these calculations using reasonable scenarios to assure the agency that Colstrip emissions are well within emission standards.	The Department changed the language in this reporting requirement to read “Colstrip shall maintain a log of any exceedence of NO _x when burning fuel other than coal as required by Section III.C.12. The Department will compare the calculated emission limit with the results from the NO _x CEMS”.
Section III.C.18.e	Delete the requirement for Btu per hour calculated as a function of heat rate and megawatt production. Currently, plant Btu per megawatt hour heat input is calculated as per 40 CFR 60, Part 75 and submitted to the agencies. Heat input calculated as a function of heat rate and megawatt production, in addition to what is already submitted, is a redundant requirement.	The Department removed this requirement. The calculation is an Acid Rain requirement and therefore already submitted.
Section III.C.32.e	Insert the following text before the word “CEMS”: “most recent version of”. The referenced QA plan has been revised since its original submittal in 1984.	The Department made this correction.

Section III.C.32.g	Change the word “minimal” to “minimum”	The Department made this correction
Section III.C.36	Change referenced section from “II.C.15” to III.C.15”	The Department made this correction
Section III.D.7	The current wording is confusing. We suggest changing the word “monitor” to “demonstrate”	The word “demonstrate” is credible evidence busting language, therefore has been replaced by the word “monitor”.
Section III.E.3	Change the word “great” to “greater”	The Department made this correction.
Section III.F, Table of conditions for EU007, EU008, and EU009, 2 nd row, frequency column	Change “weekly” to “bi-monthly”	The Department made this change because of the nature of the units requiring visual surveys.
Section III.F.5	Replace this condition with the visual survey condition in our current permit. This requirement is an overly burdensome and unnecessary change from our current Title V permit. It also involves an unauthorized change of an emission standard (15% opacity defined as an excessive emission versus the defined permit limit of 20% opacity.)	The visual survey in this permit is new language developed by the Department based on comments from EPA and the Department’s effort to clarify language for the facilities. The current language will be implemented in all Title V renewal permits. The new visual survey language does not “involve an unauthorized change in an emissions standard”. The previous language targeted ANY visual emissions (which the Department reads as any emissions with an opacity greater than 0%) for logging with corrective actions taken.
Section III.F.13	Change “require” to “required”	The Department made this correction
Section III.F.5	Clarify or delete. This paragraph doesn’t make sense and appears to conflict with the first paragraph.	This paragraph gives Colstrip the option to conduct Method 9 tests instead of bi-monthly visual surveys.
Section III.I, Table of conditions for EU0013, 2 nd and 3 rd rows, frequency column	Change “weekly” to “bi-monthly”	The Department made these changes because of the nature of the units requiring visual surveys
Section III.I.3	Replace this condition with the visual survey condition in our current permit. This requirement is an overly burdensome and unnecessary change from our current Title V permit. It also involves an unauthorized change of an emission standard (15% opacity defined as an excessive emission versus the defined permit limit of 20% opacity).	The visual survey in this permit is new language developed by the Department based on comments from EPA and the Department’s effort to clarify language for the facilities. The current language will be implemented in all Title V renewal permits. The new visual survey language does not “involve an unauthorized change in an emissions standard”. The previous language targeted ANY visual emissions (which the Department reads as any emissions with an opacity greater than 0%) for logging with corrective actions taken.
Section III.I.3	Clarify or delete 2 nd paragraph, 5 th line. This portion of the paragraph doesn’t make sense and appears to conflict with previous text.	This paragraph gives Colstrip the option to conduct Method 9 tests instead of bi-monthly visual surveys.
Appendix A – Insignificant Emitting Units	Delete Chlorine System Valves. This emitting unit no longer exists. Colstrip SES does not use chlorine gas for the cooling towers. Chlorine has been replaced by a non-gaseous additive, sodium hypochlorite.	The Chlorine System Valves have been deleted from the permit.

Appendix I – Ambient Monitoring Plan	Delete. DEQ has previously authorized discontinuing the operation of ambient monitoring in Colstrip. EPA’s PSD permit, issued to Montana Power in 1979, and assumed by PPL Montana, does not require operation of ambient monitoring sites on the Northern Cheyenne Reservation by the operator of the Colstrip Steam Electric Station. The PSD permit only requires that the operator of power plant in Colstrip fund visibility monitoring and establish a monitoring network on the Reservation. No further criteria were specified by the PSD permit. Currently the Northern Cheyenne Tribe operates those sites. The operator of those ambient sites is responsible for submission of reports meeting the criteria set out for operating PSD monitoring sites.	On October 19, 2001, the Department sent a letter to PPL approving the removal of the ambient air quality monitoring requirements from permit #0513-04 for Units 3 & 4. PPL demonstrated that the potential to cause a violation of the ambient standard is minimal at all sites and monitoring may be removed as provided for in the October 1998 Department guidance. The Department removed Appendix I -- Ambient Monitoring Plan from permit #OP0513-02.
Arnold and Porter’s October 7 th letter sent on behalf of Colstrip	Challenge the validity of DEQ’s use of the Title V process to question the validity of our 1979 PSD permit and require modeling to demonstrate compliance with PSD Class I increments. By reference to the October 7 th letter, we are reiterating those comments in their entirety with this submittal.	The Department believes that it is our responsibility under Title V of the Clean Air Act to assure compliance with the ambient standards. The Department believes that PPL has not been able to demonstrate compliance with protection of the 3-hour and 24-hour SO ₂ increments on the Northern Cheyenne reservation. Therefore, the Department requested a compliance demonstration and a schedule for achieving such compliance.

Summary of EPA Comments

The Department did not receive comments from EPA.

SECTION IV. NON-APPLICABLE REQUIREMENTS

The Department reviewed the rules and regulations contained in Section 8 of the application that PPL identified as non-applicable. The Department included those regulations that it agreed were non-applicable to MPC Colstrip Units 3&4 in the Operating Permit in Section IV along with the reasons for non-applicability.

The Department did not identify all of the rules or regulations identified by PPL. Rules and regulations which identify procedural requirements and those which do not establish emission limits or applicable requirements on the facility.

40 CFR 60, Subpart Da is not applicable because construction of the facility began prior to September 18, 1978.

SECTION V. OTHER CONSIDERATIONS

A. MACT Standards

As of October 20, 2004, the Department is aware of one future MACT Standard that may pertain to the Colstrip Steam Electric facility. PPL may be subject to the Utility MACT, scheduled to be promulgated in December of 2004.

B. NESHAP Standards

As of October 20, 2004, the Department is unaware of any future NESHAP Standards that may be promulgated that will affect this facility.

C. NSPS Standards

As of October 20, 2004, the Department is unaware of any future NSPS Standards that may be promulgated that will affect this facility.

D. Risk Management Plan

A Risk Management Plan as defined in 40 CFR Part 68 is required for PPL Colstrip Units 3&4. The facility must comply with 40 CFR 68 requirements no later than June 21, 1999; three years after the date on which a regulated substance is first listed under 40 CFR 68.130; or the date on which a regulated substance is first present in more than a threshold quantity in a process, whichever is later.